

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

DEBORA BAYNE, and all other persons similarly
situated,

Plaintiff,

– **against** –

NAPW, INC. *d/b/a* National Association of
Professional Women and *d/b/a* International
Association of Women, and
PROFESSIONAL DIVERSITY NETWORK, INC.
d/b/a National Association of Professional Women
and *d/b/a* International Association of Women,

Defendants.

No. 18-CV-3591 (MKB) (RER)

PARTIES’ JOINT MOTION FOR EXTENSION OF TIME OF DISCOVERY DEADLINE

Defendants NAPW, INC. *d/b/a* National Association of Professional Women and *d/b/a* International Association of Women (“Defendant”), by and through their attorneys at Dinsmore and Shohl, LLP, and Plaintiffs, Debra Bayne and all other persons similarly situated, through their Attorney at Virginia & Ambinder, LLP, respectfully request this Court extend the previously set discovery deadline per the Court Order of July 15, 2019. When an act may or must be done within a specified time, the court may, for good cause, extend the time: (A) with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires; or (B) on motion made after the time has expired if the party failed to act because of excusable neglect.” Fed. R. Civ. P. 6(b)(1).

In support, the parties state as follows:

1. On July 15, 2019, this Court entered a Scheduling Order with the discovery deadline of May 29, 2020.

2. In light of the delays caused by our nation's response to the COVID-19 pandemic, the parties agree that an extension of the discovery deadline is appropriate and necessary to resolve all outstanding discovery related issues.
3. Accordingly, the parties request that the discovery deadline is extended to June 29, 2020.

WHEREFORE, the parties request that the Court extend the discovery deadline to June 29, 2020, which have been agreed upon by the parties and any other relief this Court deems just.

Dated: May 28, 2020

Respectfully submitted:

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